

From: Alison Osullivan <aosullivan@suquamish.nsn.us>
Sent: Thursday, April 01, 2021 4:27 PM
To: Sanga, Ravi <Sanga.Ravi@epa.gov>
Cc: dtaylor@suquamish.nsn.us
Subject: Re: East Waterway Proposed Plan Draft Final 022321

Thank you Ravi for the extension. Below are the Suquamish Tribe comments on the East Waterway Proposed Plan.

General Comment: Throughout the proposed plan, there are references to the requirement for alternatives to protect human health and the environment. The protection of human health is equated with "acceptable" risk levels, which are generally understood to be within the range of 10^{-4} to 10^{-6} for cancer risks (10^{-5} to 10^{-6} for MTCA). However, it is likely that the acceptable level for protection for human health is going to default to the proposed anthropogenic background levels, at least for most of the risk drivers. Section 6.2.2 does explain how this works relative to PRGs. Add similar discussion to the evaluation of alternatives regarding the protection of human health and be as clear as possible what that will actually mean.

General Comment: It is preferred if clean-up activities and channel deepening activities can be coordinated. Both of these will potentially affect Tribal Treaty fishery activities and any opportunity to minimize impacts should be considered. Coordination with the Suquamish Tribe will be critical before and during design, dredging and other cleanup activities.

Section 2 (Page 5): It is not clear from the discussion whether the 2004 Phase I removal/TCRA is part of the area to be remediated. Although it says that there has been some recontamination and concentrations remain below those prior to the removal action, do current concentrations exceed RALs or PRGs? It would also be helpful to show this area on one of the figures.

Section 3.2.1 and 3.2.2 (Page 12 and 13): Mention the source control sufficiency memo.

Section 3.2.3 (Page 17): State that the Slip 36 cleanup will be consistent with EW RAOs and clean up levels.

Section 3.2.4: Consider expanding the discussion about EPA's policy regarding AB so it is clear why it is important at this site. Summarize or include a link to the draft AB memo. Most reviewers aren't going to be familiar with the outcome of this determination before they read the Proposed Plan. Although the Tribe did participate in the AB workgroup meetings I would not say that the Tribe "supports" the use of AB.

Section 5.1.1 (Table 4, Page 23): Quantify risk to Tribal members and include Suquamish risk numbers in Table 4.

Section 5.3 (Page 28): See General Comment above regarding protection of human health. The basis of taking action on this site is above 10^{-4} but needs clarification.

Section 6 (Page 28): It may be helpful to explicitly state that actions reducing concentrations in sediment are expected to achieve RAOs. Consider adding a note that "protective" levels are going to be defined by PRGs in Section 6.2, unless it seems too redundant.

Section 6.2 (Page 28): Coordination with the Tribe should occur prior to finalization of PRGs. Including but not limited to any new requirements identified or proposed modification of PRGs.

Section 7.1 (Page 32): Explain the rationale for taking a different approach in establishing the PCB RALs.

Section 8.1 (Page 43 and 44): It is not clear that any of the alternatives will achieve "acceptable" levels of protection for human health (RAO 1), especially for tribal members. The discussion notes that modeling predicts that the alternatives will result in fish and shellfish that are safe for consumption at the 1 meal/month rate. This rate is previously described as recreational and would not be protective of tribal members/an RME scenario.

Section 8.1 (Page 43 and 44): This section states that each action alternative achieves similar levels of overall protection through removal. What level of risk reduction will be achieved through removal for each alternative? What additional level of risk reduction will be achieved through additional remedial components, other than ICs? What are the expected final levels of risk reduction at the end of the estimated time to achieve RAOs for each alternative?

Section 8.3.2 (Page 44): If the preferred alternative will not achieve acceptable risk levels (RAO 1), aren't ICs for consumption essentially a component of the remediation alternative and will remain in place in perpetuity?

If you have questions regarding the comments above please don't hesitate to email.
Thanks,

Alison OSullivan, Senior Biologist and Denice Taylor, Environmental Scientist

From: Sanga, Ravi <Sanga.Ravi@epa.gov>

Sent: Thursday, March 4, 2021 8:52 AM

To: Alison Osullivan <aosullivan@suquamish.nsn.us>; glen.stamant@muckleshoot.nsn.us; Unknown <Glen@muckleshoot.nsn.us>; Denice Taylor <dtaylor@suquamish.nsn.us>

Cc: Lynch, Kira <lynch.kira@epa.gov>; Blocker, Shawn <Blocker.Shawn@epa.gov>

Subject: RE: East Waterway Proposed Plan Draft Final 022321

Sure How long would you like ? How about end of March ?

From: Alison Osullivan <aosullivan@suquamish.nsn.us>

Sent: Wednesday, March 03, 2021 6:56 PM

To: Sanga, Ravi <Sanga.Ravi@epa.gov>; glen.stamant@muckleshoot.nsn.us; Unknown <Glen@muckleshoot.nsn.us>; dtaylor@suquamish.nsn.us

Cc: Lynch, Kira <lynch.kira@epa.gov>; Blocker, Shawn <Blocker.Shawn@epa.gov>

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Ravi would it be possible to get an extension on the comment deadline?

Thanks,

Alison

From: Sanga, Ravi <Sanga.Ravi@epa.gov>

Sent: Thursday, February 25, 2021 8:03 AM

To: Alison Osullivan <aosullivan@suquamish.nsn.us>; glen.stamant@muckleshoot.nsn.us; Unknown <Glen@muckleshoot.nsn.us>; Denice Taylor <dtaylor@suquamish.nsn.us>

Cc: Lynch, Kira <lynch.kira@epa.gov>; Blocker, Shawn <Blocker.Shawn@epa.gov>

Subject: East Waterway Proposed Plan Draft Final 022321

Alison, Denice and Glen Attached is the most recent draft of the EW Proposed Plan. If I could get any comments back by COB March 16th, that would be great !

Thanks

Ravi